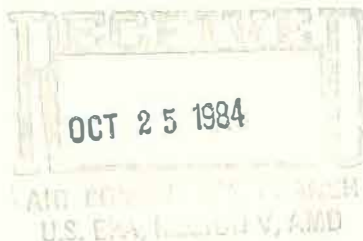


CODED 11/21/84



Technical and Transportation Operations  
Body and Assembly Operations

Mr. C. Loomis  
Air Enforcement  
U.S. EPA, Region V  
230 S. Dearborn Street  
Chicago, Illinois 60604



Ford Motor Company  
The American Road  
P.O. Box 1899  
Dearborn, Michigan 48121-1899

October 22, 1984

NESHAPS Coordinator  
Air Quality Division  
Michigan Department of Natural Resources  
P.O. Box 30028  
Lansing, Michigan 48909

Subject: Revision of Intent to Renovate Letter Dated October 12, 1984

This is to advise that the starting and completion dates provided for the removal of asbestos in the Ford Motor Credit Company Building Fan Room No. 6 and adjacent storage rooms were wrong. Our intent is to remove the asbestos over the Thanksgiving Holiday weekend and we erroneously provided the starting date as Wednesday, November 27, 1984 and the completion date as Sunday, December 2, 1984.


The correct timing is:

Starting Date: Construction of Enclosures will commence after 6:00 p.m., Wednesday, November 21, 1984. Asbestos removal will begin at 6:00 a.m., Friday, November 23, 1984.

Completion Date: Sunday, November 25, 1984.

We are sorry if this has caused any inconvenience. If additional information is required, please write or call Mr. W. Hoston, III, Room B-20, Ford World Headquarters, telephone (313) 322-0059. A copy of the original letter is attached.

Sincerely,

  
W. Schauwecker, Manager  
Building and Administrative  
Services Department

Attachment



Technical and Transportation Operations  
Body and Assembly Operations

Ford Motor Company  
The American Road  
P.O. Box 1899  
Dearborn, Michigan 48121-1899

October 12, 1984

Mr. C. Loomis  
Air Enforcement  
U. S. EPA, Region V  
230 S. Dearborn Street  
Chicago, Illinois 60604

NESHAPS Coordinator  
Air Quality Division  
Michigan Department of Natural Resources  
P. O. Box 30028  
Lansing, Michigan 48909

Subject: Notice of Intent to Renovate

Reference: NESHAP Asbestos Regulations: 40 CFR 61

- (1) Name of Owner: Ford Motor Company  
Address: World Headquarters  
The American Road  
Dearborn, Michigan 48121  
Building and Administrative Services Department  
Room B-56
- (2) Description of Facility: The Ford Motor Credit Company is a two story general office building.

Size of Facility: The Ford Motor Credit Company Building is approximately 661,000 gross sq. ft.

The intent is to remove blown-on asbestos insulation from the ceilings in the following lower-level areas:

<u>Name</u>	<u>Sq. Ft.</u>	<u>Sq. Ft. of Asbestos</u>
NW Storage Area:	676	250
Movers Storage Area:	2,120	400
Paper Baling Room:	627	250
Fan Room No. 6	2,383	800
Totals	<u>5,806</u>	<u>1,700</u>

Age of Facility: Baling Room: 19 years  
Other Areas: 17 years

(3) Approximate Amount of Friable Asbestos Material:

Aproximately 1700 sq. ft. of 49% chrysotile asbestos one inch thick, or 142 cu. ft. A heavy metal lath to which the asbestosies adhered will also be removed and disposed of by the methods required for the asbestos.

(4) The Ford Motor Credit Company Building is situated north of the Ford World Headquarters Building in Dearborn, Michigan, on property bounded by Michigan Avenue, Hubbard Drive, the Southfield Freeway and Mercury Drive.

(5) Starting Date: Construction of enclosures will commence after 6:00 p.m., Wednesday, November 27, 1984. Asbestos removal will begin at 6:00 a.m., Friday, November 29, 1984.

Completion Date: Sunday, December 2, 1984.

(6) Nature of Renovation and Methods:

An office area is to be constructed in the northwest Storage Area. The asbestos insulation is to be removed prior to installation of a false ceiling. While performing the removal work in the storage area, we will remove asbestos insulation in adjacent and nearby areas in order to preclude repeating the bidding, notification, enclosure and disposal work at a later date.

Removal areas will be separated from other areas by means of at least 6-mil polyethylene film. An enclosure will be constructed for a changing room for the contractor's employees. Pathways from the work area to the nearby dock area will be enclosed in polyethylene film, and all intersecting corridors will be blocked off. All HVAC supply and exhaust in the area will be shut down during the removal work. The asbestos will be wetted and stripped from the metal mesh to which it is attached and placed in plastic bags or metal drums, as appropriate. The metal mesh will be pulled down, cut into pieces and placed in metal drums. All ceilings, light fixtures, pipes, pumps and fans in the area will be vacuumed and washed and a light seal coat will be applied to the area where the asbestos will be removed. The temporary enclosures will be taken down and placed in drums or plastic bags. The drums and plastic bags will be stored in the north truck well of the dock area until the morning of Monday, December 3, 1984 when it will be transported to the waste disposal site.

(7) Procedures to be Used to Comply with Standard:

Ford Stationary Source Environmental Control Office (SSECO) Bulletin No. 30, which describes NESHAP, 40 CFR 61 of the U.S. "Clean Air Act", certain requirements of the Toxic Substances Control Act and OSHA regulations (29 CFR 1910.1001), will be provided to the Contractor as part of the Specifications.

Clayton Environmental Consultants, Inc., of Southfield, Michigan, will be contracted by Ford Motor Company to conduct air monitoring during the renovation. Clayton will be empowered to stop the work should fiber levels above 0.05 fibers per cc be detected, the Contractor fails to follow procedures, or if the enclosures are inadequate or breached. Clayton will collect clearance samples at the completion of removal and cleanup procedures. Recleaning and resampling will be performed if levels above 0.05 fiber per cc are detected.

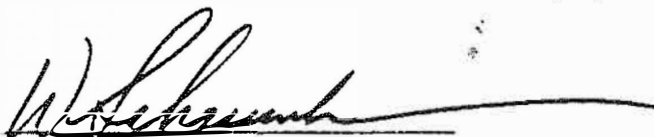
(8) Name and Location of Disposal Site:

The asbestos removal Contractor will transport the waste material to Wayne Disposal, Inc. Site No. 2, 49350 North Service Drive, Belleville, Michigan. Wayne Disposal's mailing address is P.O. Box 5187, Dearborn, MI 48128.

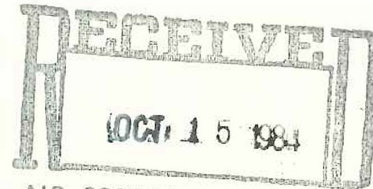


Wm. Hoston III  
Plant Engineer  
Building and Administrative  
Services Department

Concur:



W. Schauwecker, Manager  
Building and Administrative  
Services Department



AIR COMPLIANCE BRANCH  
U.S. EPA, REGION V, AMD

Technical and Transportation Operations  
Body and Assembly Operations

Ford Motor Company  
The American Road  
P.O. Box 1899  
Dearborn, Michigan 48121-1899

October 12, 1984

Mr. C. Loomis  
Air Compliance Branch  
U. S. EPA, Region V  
230 S. Dearborn Street  
Chicago, Illinois 60604

NESHAP Coordinator  
Air Quality Division  
Michigan Department of Natural Resources  
P. O. Box 30028  
Lansing, Michigan 48909

Gentlemen:

Subject: Notification of Intent to Renovate

This is to advise that a portion of the asbestos removal work planned at the Ford Motor Credit Company Building, Dearborn, Michigan, during the period August 31, 1984 through September 3, 1984, was not accomplished. The work has been rescheduled to the weekend of November 3 and 4, 1984.

Copies of the initial "Intent to Renovate" letter and a subsequent letter providing additional information are attached. The letters describe the planned asbestos removal areas as the Carpenter and Electrical Shops, Machine Room No. 1 and Machine Room No. 2. The asbestos was removed in the Carpenter and Electrical Shops and Machine Room No. 2. We did not remove the asbestos in Machine Room No. 1. We could not shut down the air conditioning chillers because of high outside temperatures and deferred the work until cold weather.

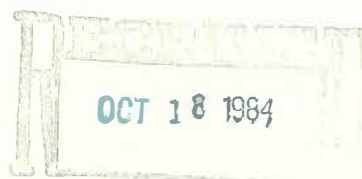
All procedures and methods described in the original letters will be followed.

Very truly yours,

W. Hoston III, Plant Engineer  
Building and Administrative  
Services Department  
Room B-56, WHQ  
Phone: (313) 322-0059

Concur:

E. T. Thornhill, Section Supervisor  
Building and Administrative  
Services Department



AIR COMPLIANCE BRANCH  
U.S. EPA, REGION V, AIRD

Technical and Transportation Operations  
Body and Assembly Operations

Ford Motor Company  
The American Road  
P.O. Box 1899  
Dearborn, Michigan 48121-1899

October 12, 1984

Mr. C. Loomis  
Air Enforcement  
U. S. EPA, Region V  
230 S. Dearborn Street  
Chicago, Illinois 60604

NESHAPS Coordinator  
Air Quality Division  
Michigan Department of Natural Resources  
P. O. Box 30028  
Lansing, Michigan 48909

Subject: Notice of Intent to Renovate

Reference: NESHAP Asbestos Regulations: 40 CFR 61

- (1) Name of Owner: Ford Motor Company  
Address: World Headquarters  
The American Road  
Dearborn, Michigan 48121  
Building and Administrative Services Department  
Room B-56
- (2) Description of Facility: The Ford Motor Credit Company is a two story general office building.

Size of Facility:

The Ford Motor Credit Company Building is approximately 661,000 gross sq. ft.

The intent is to remove blown-on asbestos insulation from the ceilings in the following lower-level areas:

<u>Name</u>	<u>Sq. Ft.</u>	<u>Sq. Ft. of Asbestos</u>
NW Storage Area:	676	250
Movers Storage Area:	2,120	400
Paper Baling Room:	627	250
Fan Room No. 6	2,383	800
Totals	<u>5,806</u>	<u>1,700</u>

Age of

Facility:

Baling Room: 19 years  
Other Areas: 17 years

(3) Approximate Amount of Friable Asbestos Material:

Aproximately 1700 sq. ft. of 49% chrysotile asbestos one inch thick, or 142 cu. ft. A heavy metal lath to which the asbestosies adhered will also be removed and disposed of by the methods required for the asbestos.

(4) The Ford Motor Credit Company Building is situated north of the Ford World Headquarters Building in Dearborn, Michigan, on property bounded by Michigan Avenue, Hubbard Drive, the Southfield Freeway and Mercury Drive.

(5) Starting Date: Construction of enclosures will commence after 6:00 p.m., Wednesday, November 27, 1984. Asbestos removal will begin at 6:00 a.m., Friday, November 29, 1984.

Completion Date: Sunday, December 2, 1984.

(6) Nature of Renovation and Methods:

An office area is to be constructed in the northwest Storage Area. The asbestos insulation is to be removed prior to installation of a false ceiling. While performing the removal work in the storage area, we will remove asbestos insulation in adjacent and nearby areas in order to preclude repeating the bidding, notification, enclosure and disposal work at a later date.

Removal areas will be separated from other areas by means of at least 6-mil polyethylene film. An enclosure will be constructed for a changing room for the contractor's employees. Pathways from the work area to the nearby dock area will be enclosed in polyethylene film, and all intersecting corridors will be blocked off. All HVAC supply and exhaust in the area will be shut down during the removal work. The asbestos will be wetted and stripped from the metal mesh to which it is attached and placed in plastic bags or metal drums, as appropriate. The metal mesh will be pulled down, cut into pieces and placed in metal drums. All ceilings, light fixtures, pipes, pumps and fans in the area will be vacuumed and washed and a light seal coat will be applied to the area where the asbestos will be removed. The temporary enclosures will be taken down and placed in drums or plastic bags. The drums and plastic bags will be stored in the north truck well of the dock area until the morning of Monday, December 3, 1984 when it will be transported to the waste disposal site.

(7) Procedures to be Used to Comply with Standard:

Ford Stationary Source Environmental Control Office (SSECO) Bulletin No. 30, which describes NESHAP, 40 CFR 61 of the U.S. "Clean Air Act", certain requirements of the Toxic Substances Control Act and OSHA regulations (29 CFR 1910.1001), will be provided to the Contractor as part of the Specifications.

Clayton Environmental Consultants, Inc., of Southfield, Michigan, will be contracted by Ford Motor Company to conduct air monitoring during the renovation. Clayton will be empowered to stop the work should fiber levels above 0.05 fibers per cc be detected, the Contractor fails to follow procedures, or if the enclosures are inadequate or breeched. Clayton will collect clearance samples at the completion of removal and cleanup procedures. Recleaning and resampling will be performed if levels above 0.05 fiber per cc are detected.

(8) Name and Location of Disposal Site:

The asbestos removal Contractor will transport the waste material to Wayne Disposal, Inc. Site No. 2, 49350 North Service Drive, Belleville, Michigan. Wayne Disposal's mailing address is P.O. Box 5187, Dearborn, MI 48128.



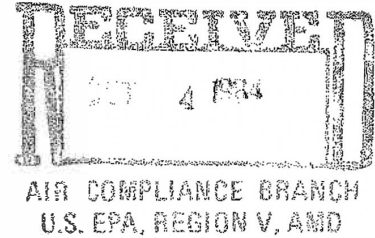
Wm. Hoston III  
Plant Engineer  
Building and Administrative  
Services Department

Concur:



W. Schauwecker, Manager  
Building and Administrative  
Services Department





Technical and Transportation Operations  
Body and Assembly Operations

Ford Motor Company  
The American Road  
P.O. Box 1899  
Dearborn, Michigan 48121-1899

October 1, 1984

Mr. C. Loomis  
Air Compliance Branch  
U. S. EPA, Region V  
230 S. Dearborn Street  
Chicago, Illinois 60604

NESHAP Coordinator  
Air Quality Division  
Michigan Department of Natural Resources  
P. O. Box 30028  
Lansing, MI 48909

Gentlemen:

Subject: Completion of Notification of Intent to Demolish or Renovate  
of August 16, 1984

Reference: Ford Motor Credit Company Building Notification of Intent to  
Demolish or Renovate of August 16, 1984

Per your request to fulfill the requirements of CFR 61.146(C) 6 and 7, the  
following information is provided:

• Nature and method(s) of demolition or renovation:

- The areas noted in the original intent letter of August 16, 1984 were being renovated. A method of stripping the sprayed on asbestos material was used.

• Removal Emission Control Procedures:

- The three areas were enclosed in a plastic enclosure.
- Sampling and analyses were performed by Clayton Environmental Consultants, Inc., using the methods recommended by the National Institute for Occupational Safety and Health (NIOSH) and OSHA-membrane filter sampling with subsequent phase-contrast microscopy. The samples were periodically taken in locations inside and outside the removal zones and in the encased exit passageway. Upon completion of the removal process, final clearance samples were taken to determine whether the Airborne fiber concentrations were within 0.05 fibers per cubic centimeter of air.

Waste handling emission control procedures were as follows:

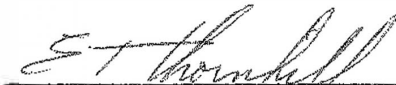
- The sprayed on insulation material was wet down in the carpenter and electrical shop, removed and placed in 55-gallon plastic lined drums and plastic bags. The waste was then moved to a holding area, from there to the disposal site.
- Machine Room #2 contains critical electrical equipment, so the wet-down method could not be used until the material had been removed from the ceiling. The wet-down procedure was then used, and the material placed in lined 55-gallon drums and plastic bags.

We will insure that all future notifications fulfill the total requirement of the National Emission Standard for asbestos.

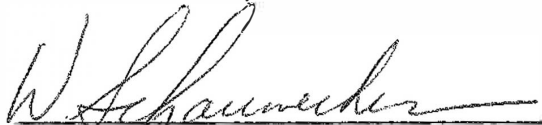


William Hoston III  
Plant Engineer  
Building and Administrative  
Services Department  
Room B-56, WHQ (313) 322-0059

Concur:



E. T. Thornhill, Section Supervisor  
Building and Administrative  
Services Department



W. Schauwecker, Manager  
Building and Administrative  
Services Department



Technical and Transportation Operations  
Body and Assembly Operations

Ford Motor Company  
The American Road  
P.O. Box 1899  
Dearborn, Michigan 48121-1899

August 16, 1984

Mr. Bruce Varner  
NESHAP Coordinator  
Air Compliance Branch  
U.S. EPA, Region V  
230 S. Dearborn St.  
Chicago, Illinois 60604

NESHAP Coordinator  
Air Quality Division  
Michigan Dept. of Natural Resources  
P. O. Box 30028  
Lansing, Michigan 48909

Subject: Notification of Intent to Demolish or Renovate

Reference: NESHAP Asbestos Regulations: 40 CFR 61

Ford Motor Company  
Ford Motor Credit Company Building  
The American Road  
Dearborn, Michigan 48121

The Ford Motor Credit Company Building is a two-story office complex with an overall dimension of 594' x 594' including 4 interior courts, 106' x 106' each, and containing approximately 660,728 sq. ft. to accommodate a population of approximately 2,600 people. The building was constructed in two phases, the first in 1965 and the second in 1967. It has always been used as an office building.

There is 3,520 sq. ft. of blown-on insulating material, consisting of 49% Chrysotile, 45% Fiberglas, and 60% fine mineral granules, on certain ceiling and corner perimeter walls in the areas identified as carpenter and electrical shops, machine rooms #1 and #3, which is to be removed.

The removal of the blown on insulating material will start at 6 p.m. on Friday, August 31, 1984 and will be completed no later than 6 p.m. on September 3, 1984.

The removal and trucking of the insulating materials will be done by Asbestos Removal, Inc., 21751 W. Nine Mile Road, Suite 122, Southfield, Michigan. All work is to be performed in strict accordance with all applicable governmental requirements. The Wayne Disposal Inc., Site #2, 49350 North Service Drive, Belleville, Michigan, P. O. Box 5187, Dearborn, Michigan, 48128, will be the disposal site.



William Hoston III  
Plant Engineer  
Building & Administrative  
Services Department  
Room B-56, WHQ (313) 322-0059

Concur:



W. Schauwecker, Manager  
Building & Administrative  
Services Department

SEP 13 1984

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

William Hoston III  
Plant Engineer  
Ford Motor Company  
The American Road  
P.O. Box 1899  
Dearborn, Michigan 48121-1899

Dear Mr. Hoston:

The U.S. Environmental Protection Agency (U.S. EPA), Region V, has reviewed your August 16, 1984 written notice of intention to remove friable asbestos material at the Ford Motor Credit Company Building facility that was post-marked on August 17, 1984. Region V has compared this notice to the notification requirements of the National Emission Standard for Asbestos in 40 CFR 61.146 (a), (b)(1) and (4), and (c)(1) through (8). These requirements apply to demolitions and renovations involving removal of at least 260 linear feet of friable asbestos material on pipes or at least 160 square feet on other facility components. We find your notice to be incomplete.

Your notice is incomplete because it lacks the following information:

- Nature and method(s) of demolition or renovation
- Removal emission control procedures
- Waste handling emission control procedures

Please submit the missing information in writing within two (2) working days following receipt of this letter.

Please insure that all future asbestos removal notices are timely and complete. Failure to submit a proper notice is a violation of the Clean Air Act for which U.S. EPA can assess and recover civil and criminal penalties of up to \$25,000 per day of violation from both the building owner and any removal contractor.

The asbestos standard was amended on April 5, 1984 and corrected on June 21, 1984, and copies of both Federal Registers are enclosed. Please address all notices for asbestos removals in Region V to Chuck Loomis, Air Compliance Branch.

Since U.S. EPA has delegated the asbestos standard to the six States in Region V, please copy the appropriate State environmental office on all Region V notices.

Sincerely yours,

George Czerniak, Chief  
Engineering Section I  
Air Compliance Branch

Enclosure (2)

cc: Robert Miller, Chief  
Air Quality Division  
Michigan Department of Natural  
Resources  
Lansing, Michigan

bcc: Kee  
Kertcher  
Kline

VARNER LOOMIS *B* GEISLER CZERNIAK *JC*  
BVARNER:ng 3-2088 9/9/84:lass:Final:09-12-84:  
Disk #7





Technical and Transportation Operations  
Body and Assembly Operations

Ford Motor Company  
The American Road  
P.O. Box 1899  
Dearborn, Michigan 48121-1899

Mr. C. Loomis  
Air Enforcement  
U. S. EPA, Region V  
230 S. Dearborn Street  
Chicago, Illinois 60604

November 20, 1984

NESHAPS Coordinator  
Air Quality Division  
Michigan Department of Natural Resources  
P. O. Box 30028  
Lansing, Michigan 48909

Subject: Notice of Intent to Renovate

Reference: NESHAP Asbestos Regulations: 40 CFR 61.

(1) Name of Owner: Ford Motor Company  
Address: World Headquarters  
The American Road  
Dearborn, Michigan 48121  
Building and Administrative Services Department  
Room B-56

(2) Description of Facility: The Ford World Headquarters Building is a twelve story general office building with a Service Wing with offices, garages, a conference room and a cafeteria.

Size of Facility: The Ford World Headquarters Building is approximately 575,000 gross sq. ft.

The intent is to remove asbestos insulation from the pipes and ducts above the cafeteria serving lines and coffee shop.



(3) Approximate Amount of Friable Asbestos Material:

Aproximately 1000 linear feet of 1" thick asbestos insulation.

(4) The World Headquarters Building is situated at 17600 Michigan Avenue in Dearborn, Michigan, on property bounded by Michigan Avenue, Hubbard Drive, the Southfield Freeway and Mercury Drive.

(5) Starting Date: Construction of enclosures will commence after 6:00 p.m., Friday, December 21. Asbestos removal will begin at 6:00 a.m., Saturday, December 22, 1984.

Completion Date: Sunday, December 30, 1984.

(6) Nature of Renovation and Methods:

Water pipe and ductwork asbestos insulation above the false ceiling over the cafeteria serving lines, storage areas and coffee shop was found damaged in several areas, with pieces of insulation laying on the top of the metal pan ceiling. Rather than repair, we have elected to replace the insulation with non-asbestos materials. The insulation will be removed. The metal pan ceiling and it's lay-in fiberglass pads will also be removed and disposed of along with the removed asbestos material.

X Dore and Associates Contracting, Inc., of Bay City, Michigan will remove the insulation and ceiling pans. The insulation will be wetted and stripped and placed in plastic bags or drums and the metal pans will be placed in metal drums. The included areas and corridors leading to building exits will be enclosed in polyethylene film and changing rooms will be constructed for the contractor's employees. All supply and exhaust fans serving the areas will be shut off. Dore will provide HEPA filter units to maintain a negative pressure within the enclosures.

(7) Procedures to be Used to Comply with Standard:

Ford Stationary Source Environmental Control Office (SSECO) Bulletin No. 30, which describes NESHAP, 40 CFR 61 of the U.S. "Clean Air Act", certain requirements of the Toxic Substances Control Act and OSHA regulations (29 CFR 1910.1001), will be provided to the Contractor as part of the Specifications.



Clayton Environmental Consultants, Inc., of Southfield, Michigan, has been contracted by Ford Motor Company to conduct air monitoring during the renovation. Clayton will be empowered to stop the work should fiber levels above 0.05 fibers per cc be detected, if the Contractor fails to follow procedures, or if the enclosures are inadequate or breeched. Clayton will collect clearance samples at the completion of removal and cleanup procedures. Recleaning and resampling will be performed if levels above 0.05 fiber per cc are detected.


(8) Name and Location of Disposal Site:

The asbestos removal Contractor will transport the waste material to Wayne Disposal, Inc. Site No. 2, 49350 North Service Drive, Belleville, Michigan. Wayne Disposal's mailing address is P.O. Box 5187, Dearborn, MI 48128.



E. T. Thornhill  
Section Supervisor  
Building and Administrative  
Services Department

Concur:



W. Schauwecker, Manager  
Building and Administrative  
Services Department